



Interdepartmental Correspondence Sheet

Date: October 27, 2016

To: Harry Black, City Manager

From: Lauren Sundararajan, CFE, Internal Audit Manager *LS*

Copies to: Internal Audit Committee
Daniel Betts, Cincinnati Recreation Commission Director

Subject: **Cincinnati Recreation Commission - Aquatics Audit**

Attached is the Cincinnati Recreation Commission (CRC) Aquatics Division audit report. The primary objective of this performance audit was to assess the health and safety of the City's municipal swimming pools. This audit was completed in accordance with Internal Audit's current work plan.

We would like to thank CRC staff for their assistance and cooperation during this audit.

If you need any further information please contact me.

Attachment

Cincinnati Recreation Commission Aquatics Audit

October, 2016



Lauren Sundararajan, CFE
Internal Audit Manager

Ann Herzner
Internal Auditor

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Executive Summary

Internal Audit (IA) conducted a performance audit of the Cincinnati Recreation Commission (CRC) Aquatics Division. The audit objective was to assess the health and safety of the City's municipal swimming pools.

CRC Aquatics Division has a responsibility to provide a clean, pleasant, and safe environment for public swimming. Rules and regulations have been developed and implemented with these responsibilities in mind. However, IA found CRC has not properly updated and documented its comprehensive policies and procedures. This includes its admittance policy and wristband procedure, both of which assist pool staff with identifying and registering pool patrons based upon their age group. Failure to implement these methods properly may result in the inability to properly identify swimmers and record accurate attendance data, which effects managerial decisions made by CRC.

Additionally, IA found CRC has not clearly defined its deep water swim tests and the results were not recorded by pool staff. This made it difficult for IA to determine the qualifications required for a patron to be deemed a capable swimmer and the way in which swimmers were identified once they passed the test. Ensuring a policy is clearly defined properly implemented by pool personnel and enforced in a standard manner across pools is imperative to swimmers' safety and consistency in pool operations.

Improvements in technology and communication would facilitate the tracking and accessibility of pool data amongst pool staff and CRC management. A physical documentation process is used to disseminate pertinent data each week. Unfortunately, this process is time consuming and creates delays for employees to compile, update and share information with management. By having a software system in place that streamlines the administration of pool data, management is able to allocate additional time to oversight of employees and verifying pool safety and health standards.

Hiring and retaining qualified candidates is essential to the success of any organization. IA found CRC's current hiring process poses challenges for Aquatics staff. This includes the length of time, the amount of training, and the cumbersome paper method used to track the progress of new hires. Creating a streamlined process may abate the typical shortages of employees at the beginning of the pool season and provide assurance that patrons' health and safety are not compromised at City pools.

Overall, the audit revealed multiple opportunities for CRC to better serve the public. IA recommends updating and documenting policies and procedures, defining and implementing uniform swim tests, providing additional oversight of personnel, enforcing current performance measures for lifeguards, streamlining documentation processes through updating software and hardware, and working with the Human Resources Department to streamline the current hiring process. By addressing these areas, CRC will improve its ability to effectively manage the health and safety of City's pools.

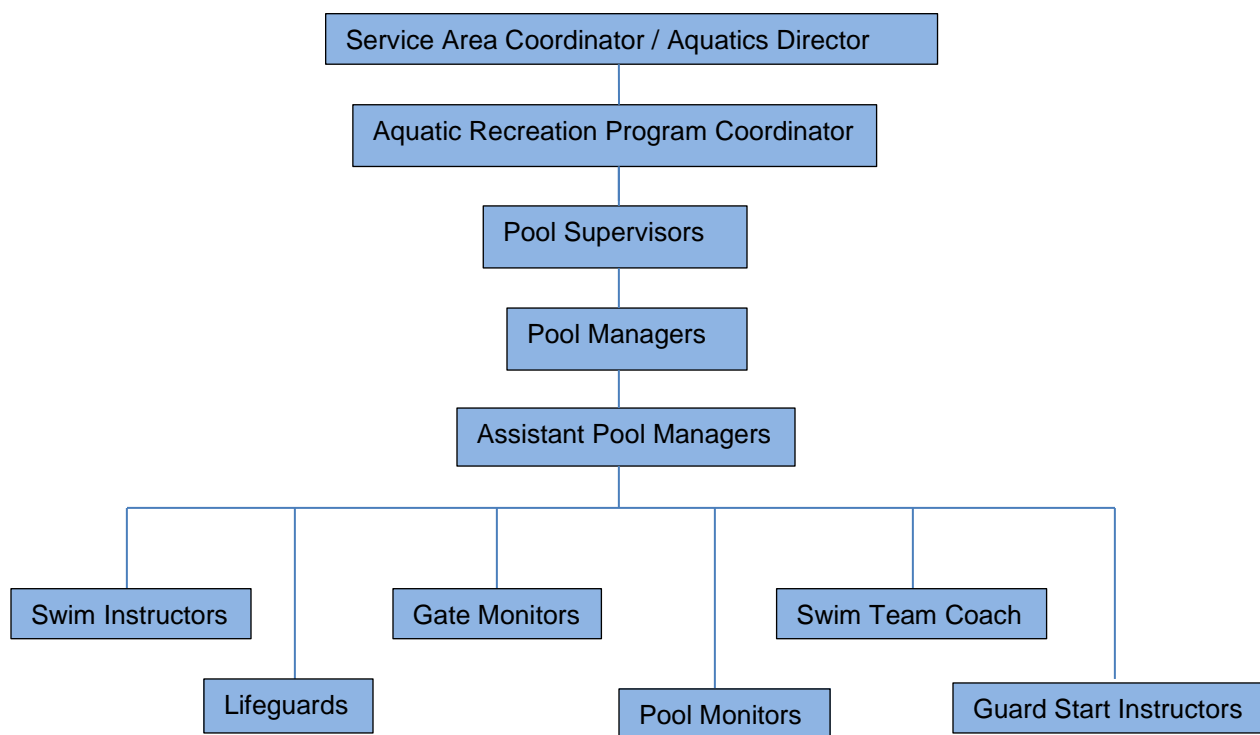
I. Introduction

Background

CRC was established in 1927 to provide recreational, cultural, leisure, and educational activities for Cincinnatians of all ages and abilities. CRC offers a variety of services including athletic leagues, senior programs, summer day camps, aquatics, and special public events for the residents and visitors of Cincinnati. City pools have rules and regulations that are governed by the Cincinnati Health Code (CHC), Cincinnati Municipal Code (CMC), and CRC's internal policies and procedures.

CRC's Aquatics Division is responsible for managing the City's 24 municipal pools and 6 stand-alone spraygrounds. They are committed to providing safe and fun, quality aquatic programming and recreational activities for all patrons. The pools are open to the public from approximately the end of late May to August.

An organization chart of the division is shown below.



The Redwoods Group

In July of 2014, CRC contracted with an outside firm, The Redwoods Group, to conduct an Aquatics Safety Assessment. The assessment focused on five safety areas and made recommendations to improve CRC's functionality. These areas included non-swimmer versus swimmer identification and protection, performance and accountability measures, guard conduct policies, decision-based training, and emergency action protocols and reporting.

This audit addressed two areas from the assessment: identifying swimmers' ability through the use of swim tests, and the performance and accountability measures used for lifeguard evaluations.

Audit Selection

IA conducted this audit as part of the current agenda.

Audit Objective

The audit objective was to assess the health and safety of the City's municipal swimming pools.

Audit Scope and Methodology

To accomplish the objective of this audit, IA interviewed relevant staff members, reviewed pertinent policies and procedures, examined operational data, and reviewed professional standards. Records reviewed included data generated from May 2016 through August 2016. IA also reviewed applicable requirements within the CMC as well as state and federal laws.

Statement of Auditing Standards

As required by the Cincinnati Administrative Code Article II §15, this audit was conducted in accordance with the Generally Accepted Government Auditing Standards (GAGAS), except for standard 3.96 pertaining to external peer review requirements. This exception did not have a material effect on the audit.

IA continues to conduct internal quality reviews to assure the conformance with applicable GAGAS. IA performed fieldwork between July 2016 and August 2016.

Commendations

Internal Audit commends the CRC staff for their cooperation throughout the audit.

II. Audit Findings and Recommendations

In conducting this audit, IA randomly selected six (25%) of the 24 CRC pools to review. IA visited the pools and tested the following: swimmer registration and identification, enforcement of pool rules, lifeguard assessment and rotation, and chemical safety and storage. Below are the results.

Comprehensive policies and procedures are not updated and documented.

Policies and procedures are key components of internal controls. Policies are designed to provide direction to staff on how to properly manage a particular function. Procedures provide employees with instructions on how to carry out the day-to-day activities. IA found that CRC policies and procedures have not been revised and properly documented. For example, CRC Aquatics policy 10-C-8 addresses the proper identification and registration of pool patrons according to their age. IA found that the registration process for admitting pool patrons varied significantly from pool to pool. This consisted of incomplete participant sign-in forms and different age classifications used. Updating admittance policies and procedures is critical to managing an effective internal control system, avoiding errors in the registration process, and accurately recording attendance data.

Proper documentation is another component of an effective internal control system. One procedure that has been instituted but not properly documented and used by all pools is the issuance of wristbands. Wristbands are used to identify the age group of young swimmers. Colored wristbands are distributed to different age groups based upon their ability to swim with or without a legal guardian. Proper documentation of the current wristband process is essential to ensure all pool staff accurately identify and account for the swimmers and their responsible party.

Recommendation 1: Update all policies and procedures to reflect current operating practices across pools.

Department Response: Agree. The admittance policy and procedures in 10-C-8, along with all other Aquatics Division policies and procedures, will be reviewed internally by CRC's Policy Committee and then sent to the City's Law Department for recommendations and revisions. CRC senior management will then seek final approval from the Recreation Commission. The Aquatics Standard Operating Procedure Manual will be updated annually thereafter.

All forms will be updated and revised based on policies and associated procedures. Ongoing training will take place to make staff aware of any changes. Aquatics Division supervisory staff will be responsible for auditing operating practices throughout the season.

Recommendation 2: Document the wristband procedure to ensure pool staff is properly identifying the age classifications of patrons in accordance with CRC rules and regulations.

Department Response: Agree. A wristband procedure/policy will be written and submitted to CRC's Policy Committee for review. It will then be sent to the City's Law Department for recommendations and revisions before final approval is obtained from the Recreation Commission. Aquatics Division supervisory staff will audit the wristband procedure to ensure compliance by staff onsite.

Swim tests are not clearly defined, recorded, and tracked.

Managing municipal swimming pools necessitates clearly defined rules and regulations for both pool staff and patrons. Due to the variations of swim tests administered at the pool sites tested, IA found CRC has not clearly defined its deep water swim tests. Additionally, the test results are not recorded by pool staff. Instead, pool staff relies on their memory to recall which swimmers are eligible to swim in the deep end of the pool. This practice inhibits the ability of lifeguards to quickly and effectively monitor the pool and identify swimmers who may be at a greater risk.

Recommendation 3: Create a standard swim test to be applied consistently across all City pools. However, the requirements of the test may vary depending on a pool's dimensions or its depth of water.

Department Response: Agree. CRC will develop a standardized swim test based upon industry standards and best practices. The department will work with information technology (IT) staff to explore available options to aid with tracking and recording the information at each site.

Please note that there is limited IT funding in the department's budget, and this will impact which options/solutions can be explored and implemented given such budget constraints. Annually, the department requests IT capital project funding for software and hardware so the amount requested for fiscal year 2018 will include funds to address the audit recommendations. However, because the City overall has limited capital funding available, the last time the department received IT funding was 2012.

Management review and oversight of key personnel is lacking.

Management review and oversight is another component of internal controls. Management oversight of key personnel is necessary to ensure processes are functioning properly and errors are detected and corrected promptly. IA found when pool supervisors visited their assigned pools, there is no requirement for them to document the duties performed. This made it especially difficult to verify how frequently the pools are checked, what documents are reviewed and the services performed on a particular day.

Recommendation 4: Create a system to ensure the oversight of pool supervisors is documented. The system should be designed so that a third party can review and verify the tasks performed after each visit.

Department Response: Agree. CRC will develop a system for ensuring frequent and consistent oversight of facilities and operations by its pool supervisors. The department will implement a checklist so that supervisors and managers can track work, record progress, and communicate efficiently. This will aid both supervisors and pool management in identifying dysfunctions and expediting corrective measures.

Performance and accountability measures for lifeguards are not routinely enforced.

Performance and accountability measures are essential for testing and evaluating personnel's ability to perform their position's required duties. Per CRC's policy, lifeguards are to be evaluated weekly and monthly. The weekly evaluations include: scanning/responding,

enforcement of rules, proper rotation/punctuality, first aid/rescue skills, relating to pool patrons, attendance, proper uniform and professional attitude. IA selected two lifeguards from each of the six pools tested and found three (25%) of 12 lifeguards did not receive a weekly evaluation for the entire pool season.

A lifeguard's capacity to respond to emergency situations is quantified in another performance measure. This drill entails dropping an orange hockey puck into the pool within the lifeguard's zone and timing their location and recovery of the puck. The drill is performed weekly at various times throughout the day for each lifeguard and assistant pool manager. Of the six pools tested, IA found one pool did not participate in this drill the entire season and another pool substituted a child for a hockey puck. Without testing and enforcing performance measures for all employees, the risk of employees' skills depreciating is high.

Recommendation 5: Enforce all components of CRC's lifeguard evaluation policies.

Department Response: Agree. Current lifeguard evaluation policies will be reviewed and updated to reflect the most effective practices in monitoring and assessing each lifeguard's job performance on a weekly basis. Because of the nature of some of the duties performed, these evaluations will be conducted on an individual level as well as in group settings. Lifeguard evaluation paperwork will be updated to more effectively and efficiently track strengths, weaknesses, and audit compliance with policy.

Technology and communication improvements are needed.

CRC uses a manual system to process the weekly paperwork submitted by pool managers. The system is time consuming, inhibits efficiency and creates delays for staff due to sorting volumes of paperwork. The elimination of the current paper process and the installation of a software program would increase the accessibility of data and the ability of management to review and track performance.

Beyond delaying the circulation of data, the lack of proper technology hinders the ability of staff to update records in online databases. Pool Managers are responsible for submitting daily attendance data into Cricket. Cricket is CRC's intranet. It is a web based system maintained by CRC IT staff and used for shared documents, program listings, membership tracking, and attendance. However, due to the lack of an accessible internet connection, staff uses personal devices to input and access the information. This could result in the delay of submitting information and exposes the City to unnecessary security risks. Further, the City's current Telecommunications Policy states, "personal devices and cell phones/wireless data services that are not used by the City of Cincinnati are prohibited from accessing, utilizing, or storing City of Cincinnati data." Although the requirements of this policy can be waived with the appropriate documentation,¹ CRC currently does not utilize these waivers.

Recommendation 6: CRC should work with the Enterprise Technology Solutions (ETS) Department to determine a software solution that will streamline the current system in place to manage pool operations.

Department Response: Agree. CRC will work with ETS to explore software and hardware options to aid in reducing the large volume of paperwork and making data processing more

¹ The City of Cincinnati's Non-City Wireless/Mobile/Electronic Device – Access Agreement form

efficient and secure. Limited IT funding in the department's budget will impact which solutions can be considered and implemented. Annually, the department requests IT capital project funding for software and hardware so the amount requested for fiscal year 2018 will include funds to address the audit recommendations. However, because the City overall has limited capital funding available, the last time the department received IT funding was 2012.

Recommendation 7: Enforce the City's Telecommunications Policy requiring completion of the City of Cincinnati's Non-City Wireless/Mobile/Electronic Device – Access Agreement form.

Department Response: Agree. CRC will include the policy in staff training and require the completion of the City of Cincinnati's Non-City Wireless/Mobile/Electronic Device – Access Agreement form by all Aquatics Division staff, including management staff, that are authorized to access the Cricket system.

Recommendation 8: CRC should work with ETS to determine the feasibility of installing data lines and hardware at municipal pools.

Department Response: Agree. CRC IT staff will explore business solutions, including pool management software, and will work with ETS to determine the feasibility of installing data lines and hardware at pools. Again, limited IT funding in the department's budget will impact which solutions can be considered and implemented. Annually, the department requests IT capital project funding for software and hardware so the amount requested for fiscal year 2018 will include funds to address the audit recommendations. However, because the City has limited capital funding available, the last time the department received IT funding was 2012.

CRC does not have a succession plan governing the management of its Aquatics Division.

Succession planning is the process of identifying alternative personnel who have the skills to fulfill the duties of the organization's primary position. This entails documenting current processes with sufficient knowledge to allow for a seamless transition of personnel. Currently the Service Area Coordinator (SAC) position is being filled on an interim basis and IA found there is no succession plan in place. The SAC is primarily responsible for overseeing all pool operations. This includes, but is not limited to: hiring, training, placement and management of staff, aquatic programs, applying for pool licenses each year, monitoring the inventory and ordering of supplies and equipment. The interim employee has been in the position since spring 2016 and was limited in her knowledge of SAC duties and responsibilities. Documenting the fundamental components of this position and all positions within Aquatics will ensure business continuity and seamless transition of personnel.

Recommendation 9: Develop a succession plan that includes written policies and procedures governing the Aquatics Division.

Department Response: Agree. CRC must develop a succession plan that coincides with the hiring/promotional practices outlined by the City's Human Resources (HR) Department. The Aquatics Division would benefit from additional full-time staff. Restructuring the pool supervisory team would help to rebuild a strong foundation. This is vital for the growth and development of knowledgeable and experienced aquatic professionals needed to maintain the integrity and safety of Cincinnati's public pools.

The hiring process needs strengthening.

Efficient hiring processes are essential in attracting top talent, receiving positive responses from desirable candidates, and utilizing the department's time and resources in an efficient manner. CRC hires qualified personnel to manage its City pools. This is done through continuous recruiting efforts to attract and retain talent to fill key positions. However, the current hiring process poses challenges for CRC staff. This includes the length of time, the amount of training, and the cumbersome paper method used to track progress of new hires. Creating a streamlined process may abate the typical shortages of employees at the beginning of the pool season and provide assurance that patron's health and safety are not compromised at City pools.

Recommendation 10: Seek assistance from the Human Resources Department to streamline the current hiring process for pool staff.

Department Response: Agree. CRC's HR Division is working with the City's HR Department and the Innovation Lab to help streamline the hiring process. CRC is requesting assistance from the Innovation Lab to develop an efficient manner to track progress in the hiring process as well as manage all steps from recruiting applicants to "getting them into the lifeguard chair." Because the department is required by City H.R. to remove part-time staff from payroll at the end of the summer season each year, the current process presents many hurdles for potential new employees as well as returning staff. This has impacted the department's ability to retain quality staff and implement a smooth onboarding process.

Enforcement of the City's Health Code should continue.

Pool staff is responsible for enforcement of the Cincinnati Health Code (CHC). Enforcement of these rules is essential because they directly correlate to pool water quality and chemistry. At the pools visited, IA found pool staff enforced the shower upon entering the pool rule. Swimmers were reminded of this rule as they entered the locker rooms and pool decks. However, IA did observe some large groups enter the pool without showering. Given the large ratio of pool patrons to pool staff, continuous enforcement of the City's Health Code is vital to the health and safety of swimmers.

Recommendation 11: Continue to enforce the CHC by encouraging swimmers to shower upon entering the pool. This will help control the water quality and chemistry throughout City pools.

Department Response: Agree. CRC will continue to enforce the CHC at all swimming facilities.

III. Conclusion

CRC's Aquatic Division provides a valuable service to the community by offering a variety of water activities and recreational programs designed to improve the health and fitness of the individuals through its pools. The success of the division is dependent upon having the essential internal controls in place to properly manage its pools and personnel.

The audit revealed several opportunities exist for CRC to increase its efficiency and better its performance. This included updating and documenting policies and procedures, defining and implementing uniform swim tests, increasing management review over personnel, improving technology and communication, creating a succession plan for key positions, working with the City's Human Resources Department to improve the hiring process of pool staff and continuing the enforcement of CHC rules and regulations.

Implementing these changes will enable CRC's Aquatics Division to better serve the needs of the residents and visitors of Cincinnati.

IV. Cincinnati Recreation Commission Response

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